

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

N.I.V. AND TANISHA SMITH

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

WMATA Police Department ,
Officer Artis #869 , Officer Crawford #1025
ARYANA A INGRAM (The Aggressor)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. **DLB 24CV2662**

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	N.I.V and Tanisha Smith
Street Address	73 East High Street
City and County	Somerville, Somerset County
State and Zip Code	08876
Telephone Number	(718) 300-5995
E-mail Address	TanishaYhshrl@Gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	WMATA Police Department
Job or Title (if known)	
Street Address	300 7th Street
City and County	Washington, District of Columbia
State and Zip Code	D.C. 20024
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	Officer Artis Badge #869
Job or Title (if known)	Police Officer
Street Address	300 7th Street
City and County	Washington, District of Columbia
State and Zip Code	D.C. 20024
Telephone Number	(202) 962-2103
E-mail Address (if known)	

Defendant No. 3

Name	Officer Crawford Badge # 1025
Job or Title (if known)	Police Officer
Street Address	300 7th Street
City and County	Washington, District of Columbia
State and Zip Code	D.C. 20024
Telephone Number	(202) 962-2103
E-mail Address (if known)	

Defendant No. 4

Name	ARYANA A INGRAM
Job or Title (if known)	The Aggressor
Street Address	9717 Summit Circle Apt# 1A
City and County	Upper Marlboro
State and Zip Code	M.D. 20774
Telephone Number	(240) 860-5943
E-mail Address (if known)	

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Did Washington Metropolitan Area Transit Authority Police Department and it's associates violate section 310 U.S. 296, 303 (1940) , 18 U.S.C. § 242 , 42 U.S.C. § 1983 when they willfully deprived my child and I of our "human" and "civil" rights;; when they failed to investigate, used Excessive Force , committed battery, fabricated evidence , and kidnapped my child; due to the fact they did NOT like us preaching and teaching on their public platform.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (*name*) _____, is a citizen of the State of (*name*) _____.

b. If the plaintiff is a corporation

The plaintiff, (*name*) _____, is incorporated under the laws of the State of (*name*) _____, and has its principal place of business in the State of (*name*) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____. Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Because we have to live with the tormenting, horrific experience.

We get heart palpitations when we hear police sirens , and see any form of police.

Fortunately , those who have died at the hands of injustice; will NEVER again be tormented with the memories.

The amount in controversy is more than \$75,000, not counting interest and costs of court, is because we are seeking damages for multiple violations of our constitutional / human rights, including but NOT limited to; conspiring to violate our freedom of speech to share our religion, police perjury , unlawful detention, Battery, Mental anguish/distress , pain and suffering (for the rest of our life on earth) and physical injury to my shoulders. In addition to using excessive force against my minor child N I.V who has a sensory type disability, pepper spraying him, dragging by the hand cuffs which also caused his pants to fall down, and exposing his private parts (without underwear on) to strangers as they record, and then KIDNAPPING him and I. Said violations have caused significant harm and suffering, both physically, mentally, and emotionally.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On May 15, 2024 we were preaching and teaching in WMATA'S Vicinity , particularly at Shady Brook Grove bus / train stop, around 1600-1800 Hours . Subsequently, at approximately 1800 hours my child and I boarded the train. moments later , a 23 year old female (ARYANA A INGRAM) (twice my size) came into our train car and begins bullying and threatening me. She then attacked me, with a hard push.

I defended myself to the best of my 47 Year old ability. WMATA PD later arrived on scene at Largo rail station, and unlawfully detained me, without asking any questions. I offered to show them our video recorded evidence, of the fight. However, they ignored me and instead, used excessive force , and battered my child N.I.V. and I.

They pepper sprayed my autistic child (N I V), and dragged him by the hand cuffs, which they'd wrongfully placed on him.. As the WMATA police were dragging my son, his pants fell down, causing his NAKED private parts to be exposed to onlookers who were recording.. WMATA Police Officers then fabricated evidence, and KIDNAPPED us... I have proof of said violations from "my" body camera; as well as their own. The probably cause Documents contradicts video evidence TREMENDOUSLY.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The psychological damages we have endured
exceeds; the physical injuries and are challenging to
quantify... The sound of police sirens and their presence
triggers severe distress for N.I.V and I , worsening our
condition. It seems to be defeating the purpose of our
 psycho therapy. I have been suffering from excruciating
 shoulder pain that NEVER goes away. And can no longer
 carry my duties as a CNA (Certified Nurse). A career I
 LOVED . Even my daily routines are difficult for me.
 Including but NOT limited to , bathing cooking, sleeping and
 caring for my autistic child N I.V).
 In addition , my child and I no longer trust any police, GOD
 forbid we are ever in need; we are terrified of them.
 My son even becomes sad and angry, every time he sees
 them on T.V. Given the lasting impact of said damages and
 the necessity for long-term phycological and physical
 therapy.
 We are seeking \$9.9million in relief / compensation.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: September 9th, 2024.

Signature of Plaintiff



Printed Name of Plaintiff

TANISHA SMITH and N I.V.

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address
